John Neil Stephenson (SBN 12497) 1 STEPHENSON LAW, PLLC 1770 Verdi Vista Court 2 Reno, Nevada 89523 3 T: 510-502-2347 E: johnstephensonlaw@gmail.com 4 W: stephensonfirm.com Counsel for Defendant Hacienda Rooming House, Inc. 5 dba Bella's Hacienda Ranch 6 UNITED STATES DISTRICT COURT 7 **DISTRICT OF NEVADA (RENO)** 8 9 JANE DOE; Case No. 3:24-cv-00065-MMD-CSD 10 Plaintiff, **DEFENDANT HACIENDA ROOMING** HOUSE, INC. D/B/A BELLA'S 11 HACIENDA RANCH'S JOINDER TO  $\mathbf{v}_{ullet}$ 12 **BROTHEL DEFENDANTS' RESPONSES [##123, 124] TO** JOSEPH LOMBARDO, Governor of 13 Nevada, in his official capacity; AARON PLAINTIFF'S RESPONSE [#115] TO 14 FORD, Attorney General of Nevada, in his ORDER TO SHOW CAUSE [#112] official capacity; NYE COUNTY; ELKO 15 **COUNTY; STOREY COUNTY; WESTERN** BEST, INC. D/B/A CHICKEN RANCH; 16 WESTERN BEST, LLC; DESERT ROSE 17 CLUB, LLC; HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA 18 **RANCH: MUSTANG RANCH** PRODUCTIONS, LLC d/b/a MUSTANG 19 RANCH LOUNGE, LLC; LEONARD 20 "LANCE" GILMAN, in his official capacity; and LEONARD "LANCE" 21 GILMAN, in his individual capacity, 22 Defendants. 23 24 /// 25 /// 26 /// 27 28

## MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Hacienda Rooming House, Inc. d/b/a Bella's Hacienda Ranch ("Bellas") hereby joins the responses by Defendants Mustang Ranch Productions, LLC and L. Lance Gilman [#123] and Desert Rose Club, LLC [#124].

DATED: September 16, 2024 STEPHENSON LAW, PLLC Ohn Neil Stephenson

By: John Neil Stephenson Its: Managing Member

Counsel for Defendant Hacienda Rooming House, Inc. dba Bella's Hacienda Ranch

**CERTIFICATE OF SERVICE** 

I hereby certify that I electronically filed the foregoing, DEFENDANT HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA RANCH'S JOINDER TO BROTHEL DEFENDANTS' RESPONSES [##123, 124] TO PLAINTIFF'S RESPONSE [#115] TO ORDER TO SHOW CAUSE [#112] by using the CM/ECF system on the date indicated below. To the best of my knowledge and belief, I certify that participants in the case are registered electronic filing system users and will be served via this Court's CM/ECF system.

DATED: September 16, 2024 STEPHENSON LAW, PLLC

By: John Neil Stephenson Its: Managing Member

Counsel for Defendant Hacienda Rooming House, Inc. dba Bella's Hacienda Ranch

ohn Neil Stephenson